

KARISH & BJORGUM, PC

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Attorneys for Movant

**UNITED STATES DISTRICT COURT
IN AND FOR THE CENTRAL DISTRICT OF CALIFORNIA**

In Re:

DMCA SUBPOENA TO

CLOUDFLARE, INC.,

Case No. 2:24-mc-00084-JFW-PVC

**SECOND STIPULATION TO
EXTEND BRIEFING ON MOTION
TO QUASH AND FOR
PROTECTIVE ORDER ON DMCA
SUBPOENA**

[Proposed Order Attached]

Judge: Hon. Pedro V. Castillo

Date: N/A

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2 Whereas, on July 15, 2024, this Court issued to Movant PCR Distributing,
3 Inc. a subpoena directed to Cloudflare, Inc. under the Digital Millenium Copyright
4 Action (DMCA) (Dkt. No. 5) seeking information regarding the Operators of the
5 website nhentai.net;

6 Whereas, Movant states that it duly served that subpoena;

7 Whereas, on July 18, 2024, Plaintiff's counsel received an email from
8 Jennifer Rynell of Wilson Whitaker Rynell, attorneys for nhentai.net ("Intervenor"),
9 regarding motion practice or a possible resolution on the subpoena;

10 Whereas, the Motion was assigned to Magistrate Judge Pedro V. Castillo,
11 who issued an order on July 26, 2024 granting the motion to intervene and to stay
12 the deadline in the subpoena pending further briefing on Intervenor's remaining
13 requested relief, with Movant's response being due August 9, 2024 and Intervenor's
14 reply due August 16, 2024;

15 Whereas, the parties previously entered into one stipulated continuance for
16 fourteen (14) days, which was granted by this Court;

17 Whereas, Movant's counsel states that he has been discussing this matter with
18 his client after his client's return from business travel outside of the U.S. but has not
19 reached a final decision on how to proceed; and

20 Whereas, on August 21, 2024, Movant's counsel requested Intervenor's
21 counsel agreed to a further extension of all dates as set forth below;

22 Therefore, it is stipulated by and among counsel for Movant and Intervenor
23 that Movant shall have until August 30, 2024 to file its response, and Intervenor
24 shall have until September 13, 2024 to file its reply.
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1 Dated: August 22, 2024

Respectfully submitted,

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By: /s/ Eric Bjorgum

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Eric Bjorgum

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KARISH & BJORGUM PC

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Attorneys for Movant

7 Dated: August 22, 2024

Respectfully submitted,

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By: /s/ Jennifer Rynell

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Jennifer Rynell

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WILSON WHITAKER RYNELL

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Attorneys for Intervenor

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